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**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In re:

BLOCKFI INC., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 22-19361 (MBK)

(Jointly Administered)

**APPLICATION FOR ORDER SHORTENING TIME FOR NOTICE OF  
DEBTORS' MOTION FOR ENTRY OF AN ORDER (I) AUTHORIZING  
AND APPROVING THE SETTLEMENT AND RELEASE OF CLAIMS BY  
AND AMONG BLOCKFI INC. AND DESERVE, INC. AND (II) GRANTING  
RELATED RELIEF**

TO: THE HONORABLE CHIEF JUDGE MICHAEL B. KAPLAN  
UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY

BlockFi Inc. and its debtor affiliates (collectively, "BlockFi" or the "Debtors"), as debtors  
and debtors-in-possession in the above-referenced Chapter 11 cases (the "Chapter 11 Cases"), by

<sup>1</sup> The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Debtors' service address is 100 Horizon Center Blvd., 1st and 2nd Floors, Hamilton, NJ 08691.

and through their undersigned counsel hereby file this application (the “Application”) and request that the time period to notice a hearing on the *Debtors’ Motion for Entry of an Order (I) Authorizing and Approving the Settlement and Release of Claims By and Among BlockFi Inc. and Deserve, Inc. and (II) Granting Related Relief* (the “Deserve Settlement Motion”)<sup>2</sup> as required by FED. R. BANKR. P. 2002 be shortened pursuant to FED. R. BANKR. P. 9006(c)(1), for the reason(s) set forth below:

1. Contemporaneously herewith, the Debtors filed the Deserve Settlement Motion. The Deserve Settlement Motion seeks entry of an Order approving BlockFi Inc.’s entry into the Deserve Settlement.

2. The Debtors respectfully request that the Court enter the proposed order (the “Order”) attached hereto as **Exhibit A**, scheduling a hearing on the Deserve Settlement Motion for the Court’s next omnibus setting in these Chapter 11 Cases on October 10, 2023, at 11:00 a.m. ET. The Debtors request shortened notice to expedite the process for the initial distribution of \$4,107,349.99 in settlement funds to the estate.

3. A shortened notice period will not prejudice any parties and is not prohibited under FED. R. BANKR. P. 9006(c)(1). Both Deserve and the Committee are supportive of the Deserve Settlement Motion and this Application for shortened notice. Given that (i) the Deserve Settlement seeks resolution of a two-party dispute between Deserve and BlockFi and (ii) Court approval of the Deserve Settlement will result in an increase in accessible funds to the estate, the Debtors do not anticipate the Deserve Settlement Motion will be contested.

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<sup>2</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Deserve Settlement Motion.

**WHEREFORE**, the Debtors respectfully request entry of the Order shortening the notice period for the Deserve Settlement Motion, and for such other and further relief as the Court may deem just and appropriate.

Respectfully Submitted,

Dated: October 5, 2023

/s/ Michael D. Sirota

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